

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

CIVIL ACTION NO. 8:07-cv-03406-HMH-WMC

MELODY EADIE,

Plaintiff,

v.

ANDERSON COUNTY DISABILITIES
AND SPECIAL NEEDS BOARD,

Defendant.

DEFENDANT'S ANSWERS TO 26.03
INTERROGATORIES

Pursuant to Local Civil Rule 26.03, the Defendant herewith answers the following Interrogatories:

1. A short statement of the facts of the case.

ANSWER:

This action arises from the Plaintiff's termination by the Defendant on or about July 19, 2006. Plaintiff alleges that she was terminated for reporting suspected abuse and that such termination was in violation of public policy; that she was terminated as a result of her race (white) in violation of Title VII; that her termination was retaliation for her report of the alleged racial discrimination/harassment in violation of Title VII; and that Defendant violated the FMLA by firing Plaintiff based on her request for and use of FMLA leave. It is Defendant's position that Plaintiff was an at-will employee, that her termination was based on reasonable, legitimate, and nondiscriminatory factors, and that the Defendant would

have made the same decision regarding Plaintiff's employment despite the Plaintiff's race, despite the Plaintiff's report of suspected abuse, despite the Plaintiff's report of alleged discrimination/harassment, and despite the Plaintiff's request for and/or use of FMLA leave.

2. The names of fact witnesses likely to be called by the party and a brief summary of their expected testimony.

ANSWER:

1. **Martha Jones
HR Director
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
2. **Clark Nesbitt
Day Program Director
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
3. **Terri Abernathy
Day Support Specialist
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
4. **Lynn Bowie
Documentation/Records Coordinator
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
5. **Dale Thompson
Executive Director
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**

6. **Mary Burts
Residential Director
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
7. **Joanne Whitner
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**
8. **Christopher Scotland
12781 Edgewood Drive
McCalla, AL 35111**
9. **Trudy Cole
Anderson County DSN Board
212 McGee Road
Anderson, SC 29625**

All witnesses listed above are current or former employees of the Defendant and have information regarding Plaintiff's employment and/or termination and/or other issues raised by Plaintiff's Complaint.

3. The names and subject matter of expert witnesses (if no witnesses have been identified, the subject and field of expertise should be given as to experts likely to be offered).

ANSWER:

Defendant has not retained an expert witness in this matter. However, Defendant reserves the right to do so in compliance with the Court's Scheduling Order.

4. A summary of the claims or defenses with statutory and/or case citations supporting the same.

ANSWER:

The general statutory and case law of South Carolina and applicable codes and/or regulations pertaining to the causes of action set forth in the Plaintiff's Complaint. Applicable provisions of Title VII and the FMLA and any case law pertaining thereto.

5. Absent special instructions from the assigned judge, the parties shall propose dates for the following deadlines listed in Local Civil Rule 16.02:

- (a) Exchange of Fed. R. Civ. P. 26(a)(2) expert disclosures; and
- (b) Completion of discovery.

ANSWER:

Deadlines established by Court's Scheduling Order.

6. The parties shall inform the Court whether there are any special circumstances which would affect the time frames applied in preparing the Scheduling Order. See generally Local Civil Rule 16.02(C) (Content of Scheduling Order).

ANSWER:

Plaintiff is not aware of any such circumstances at this time.

7. The parties shall provide any additional information requested in the Pre-Scheduling Order (Local Civil Rule 16.01) or otherwise requested by the assigned judge.

ANSWER:

None.

LOGAN, JOLLY & SMITH, L.L.P.

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Anderson, South Carolina
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